



RETURN TO 396-SS PDA

**SEQUOYAH FUELS CORPORATION**

P.O. BOX 610 • GORE OKLAHOMA 74435

January 16, 1986

*Docket*  
1. *...*  
2. *...*  
cc *FL*  
*WM*

*40-8027*

Mr. R. D. Martin  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive  
Suite 1000  
Arlington, Texas 76011



Dear Mr. Martin:

Sequoyah Fuels Corporation summarizes below the relationships and oversight activities of various federal and state agencies involved with regulation of activities of our Sequoyah Facility in Gore, Oklahoma. We believe this summary demonstrates the comprehensive nature of regulatory control over the Facility's operations.

As you are aware, the NRC is the primary regulatory authority and, through the license and license conditions, has prescribed rigorous requirements pertaining to all activities at the Facility. The requirements govern areas such as Facility operating procedures, control of radioactive materials including employee and public exposure limitations, effluent release limitations, waste handling and disposal, and a myriad of additional detailed items reflecting pertinent NRC regulations, guidelines, position papers, regulatory guides and NUREGs. Through routine and unannounced inspections and frequent communications with staff of NRC's office of Nuclear Material Safety and Safeguards, every phase of Sequoyah's operation has been subject to NRC inspection, review and oversight.

In addition to NRC, the Facility is subject to inspections by and complies with regulations and requirements of other federal agencies. These agencies include the U.S. Environmental Protection Agency and the Occupational Safety and Health Administration.

U.S. Environmental Protection Agency requirements governing discharge of water, disposal of defined hazardous wastes and reporting of releases are followed.

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The Facility has three U.S. EPA National Pollutant Discharge Elimination System permitted water discharge points. In connection with these permits, limits are imposed upon the level of various constituents (e.g., solids, fluorides, uranium) allowed to be present in the water, the frequency of sampling and analysis is defined and monthly submission of results to the EPA is required. EPA regional staff have also inspected the discharge points and areas contributing to the discharge.

Sequoyah also is a generator of an EPA defined hazardous waste. EPA has authorized the State of Oklahoma to manage the hazardous waste program consistent with federal requirements and maintains oversight of all components of the program. Sequoyah complies fully with both the state and federal requirements and has a disposal plan on file with the Industrial Waste Service of the Oklahoma State Department of Health. Further, the proper reports are filed with the state for each shipment, as well as a summary report each quarter.

The Sequoyah Facility also adheres to all applicable provisions of the Occupational Safety and Health Administration regulations and requirements. Lost-time and accident data are provided annually to OSHA. The Facility follows OSHA's safety and personnel protection requirements and recommendations and will comply with OSHA's Hazard Communication regulations, which the Facility must meet by May 25, 1986.

Several agencies at the state level also maintain regulatory oversight and inspect the Facility. In many instances, the areas are parallel with or duplicative of those with which federal agencies are concerned.

For example, the Oklahoma State Department of Health's (OSDH) Radiological Health Service maintains cognizance of the Facility's activities by way of frequent communication and through review of reports and documents provided by the Facility. Moreover, the Service over the past year conducted a comprehensive review of all environmental data related to the Facility, including analysis of samples collected by the Service.

The Air Quality Service of OSDH has established requirements regarding air emissions. This Service inspects the Facility for air emissions. The Facility operates under permits issued by the Service and further submits annual emission inventory reports which cover particulates,  $\text{NO}_x$ ,  $\text{SO}_2$ , fluoride, hydrogen and hydrogen fluoride.

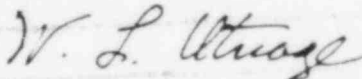
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A third entity of the OSDH, the Industrial Waste Service, controls the handling and shipment of defined hazardous wastes under authorization from U.S. EPA. In addition, this Service is concerned with the handling and disposal of other industrial wastes that are not defined as hazardous. To illustrate, the Industrial Waste Service was the state entity involved in permitting the underground injection well proposed for disposal of treated raffinate solution. This Service made many visits to the Facility in association with the testing of the well and required that conditions specified by them be met. The Service was also present in December 1985 to oversee the plugging and abandonment of the injection well, after Sequoyah determined the well would not be used for raffinate solution disposal.

All the Facility's operations have been constantly conducted with the knowledge of and oversight and review by many federal and state agencies. Regardless of this regulatory oversight, Kerr-McGee and Sequoyah Fuels have always considered the health and safety of their employees and the public to be an overriding concern in the operation of the Facility.

I hope this brief summary is beneficial. If you have questions or would like to discuss this matter further, please feel free to call me at (918) 489-5511, extension 231.

Sincerely,



W. L. Utnage, Manager  
Sequoyah Facility

WLU:dd

cc: ✓ John G. Davis  
Office of Nuclear Material Safety & Safeguards (NMSS)  
U.S. Nuclear Regulatory Commission

James M. Taylor  
Director/Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission

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DESCRIPTION:

Summarizes the  
Relationships and  
Oversight Activities

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